

NEO GROUP CODE OF CONDUCT FOR SUPPLIERS

As stated in its Code of Business Conduct, NEO GROUP intends to run its operations and business in a responsible and ethical way across its value chain and expects business partners and suppliers to uphold the same principles. To enforce that commitment, NEO GROUP has created this code of conduct for suppliers (The “Code”).

SCOPE

NEO GROUP expects any suppliers of products and services, directly or indirectly engaged in a business relationship with NEO GROUP to abide with the ethical principles and standards contained in this Code. NEO GROUP expects its suppliers to effectively communicate the Code within their own organizations, as well as within their supply chain that is relevant to the products and services provided to NEO GROUP.

IMPLEMENTATION AND COMPLIANCE

The Code will be available to all stakeholders on NEO GROUP’s website and will be distributed to all NEO GROUP personnel. Relevant employees will also be provided with adequate training and additional information to ensure the Code’s correct enforcement.

NEO GROUP, in a collaborative, transparent and trust-based approach, intends to monitor and verify suppliers’ performance on Ethics, Environment, Human Rights, Labour Conditions, and Sustainable Procurement through various means, such as, but not limited to, CSR assessment platforms, desktop evaluation and/or announced on-site audits, in order to ensure compliance with the Code and to help them improve when needed.

NEO GROUP expects suppliers to allow and cooperate in the monitoring and verification of their performance against the Code.

In case of non-compliance with the Code’s provisions, NEO GROUP expects its suppliers to implement the relevant corrective actions.

Suppliers shall report in good faith any concerns or violation of this Code to their direct NEO GROUP contact person or through the NEO GROUP whistle-blowing channel: whistleblower@neogroup.eu

All reports will be duly investigated, and corrective action implemented when necessary. For more details on our whistle-blowing channel go to: <https://neogroup.eu/en/for-business/>

PROVISIONS

Business Conduct

- Suppliers shall conduct their business and interact with NEO GROUP in an ethical, transparent and responsible way following values of integrity, honesty and fairness.
- Suppliers shall ensure knowledge of and compliance with all applicable legislation and regulation in all the jurisdictions in which they operate, in particular, money-laundering and fair competition laws.
- Suppliers shall eliminate and prevent any type of corruption and/or bribery in their sphere of influence, as well as conflicts of interest.
- Monetary gifts from suppliers to any NEO GROUP employees are strictly forbidden. Gifts in form of goods, services or other are allowed but shall always be symbolic and not exceed an economic value of 50 EUR.

Human rights / Labour conditions

- Suppliers must ensure the respect of human rights as stated in the Universal Declaration of Human Rights within their organization, supply chain and sphere of influence.
- Suppliers shall respect Fundamental Principles and Rights at Work:
 - Suppliers shall not employ or exploit children, shall not use or benefit from any form of forced or bonded labor.
 - Suppliers shall recognize and respect their workers' right to associate and collectively bargain without any type of discrimination against workers who join, or not, trade unions.

- Suppliers shall provide their employees with fair and decent working conditions in regards with working hours, remuneration, benefits, leaves and holidays.
- Suppliers shall not discriminate or deny equal opportunity to its current and future employees based on criteria such as gender, race, colour, ethnicity, national origin, sexual orientation, age, religion, disability or any other status protected by law.
- Suppliers shall ensure that their workplace are free from any type of harassment and abuse.

Health & Safety

- Suppliers shall provide their employees and people working in their facilities a safe and hygienic workplace along with the relevant protective equipment, training and procedures to prevent occupational accidents and illnesses.

Quality

- Suppliers shall ensure that all the products and services they provide comply with the legally applicable quality and safety standards as well as NEO GROUP requirements stipulated in the purchase contact.

Environment

- Suppliers shall respect all applicable environmental laws and endeavor to minimize the impact of their activities on the environment and local communities. NEO GROUP encourages its suppliers to focus on mitigating climate change through the reduction of their direct and indirect greenhouse gases emissions.